

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BHARTI R. BHARWANI and ROBERT A.  
ZIRINSKY, individually on behalf of all  
others similarly situated,

Plaintiffs,

v.

LINCOLN NATIONAL CORP., and  
LINCOLN NATIONAL LIFE INSURANCE  
COMPANY,

Defendants.

Case No.: 2:16-cv-06605-GJP

**AFFIDAVIT OF MICHAEL L. HIRSCHFELD IN SUPPORT OF  
MOTION FOR ADMISSION PRO HAC VICE**

STATE OF NEW YORK     )  
                                  ) ss:  
COUNTY OF NEW YORK    )

Michael L. Hirschfeld, having been duly sworn and being of legal age, deposes and states  
as follows:

1. I am member of the bar of the State of New York (Attorney ID No. 1441468),  
having been admitted to practice on November 15, 1974.

2. I am admitted to practice in the following federal courts:

- United States District Court for the Southern District of New York (admitted December 31, 1974);
- United States District Court for the Eastern District of New York (admitted March 10, 1975);
- United States District Court for the Eastern District of Wisconsin (admitted January 14, 2013);
- United States Court of Appeals for the Second Circuit (admitted June 23, 1980);
- United States Court of Appeals for the Third Circuit (admitted January 29, 2013);
- United States Court of Appeals for the Fourth Circuit (admitted January 3, 2005);


- United States Court of Appeals for the Fifth Circuit (admitted January 19, 1999);
- United States Court of Appeals for the Sixth Circuit (admitted December 28, 2009);
- United States Court of Appeals for the Seventh Circuit (admitted February 4, 1994);
- United States Court of Appeals for the Tenth Circuit (admitted March 15, 2004);
- United States Court of Appeals for the Eleventh Circuit (admitted April 9, 2001);
- United States Court of Federal Claims (admitted April 7, 1987); and
- Supreme Court of the United States (admitted May 20, 1996).

3. I am at present a member of the aforesaid bars in good standing. All of the aforesaid bar memberships are currently active except the memberships in the United States Courts of Appeals for the Fifth and Eleventh Circuits, which are presently inactive.


4. I have never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar of which I have been a member or any court to which I have been admitted to practice *pro hac vice*.

5. I have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and agree to be bound by both sets of Rules for the duration of this case.

6. If *pro hac vice* status is granted, I will in good faith continue to advise counsel who has moved for my *pro hac vice* admission of the current status of this case and of all material developments herein.

  
Michael L. Hirschfeld

Subscribed and sworn to before me  
this 6<sup>th</sup> day of March, 2017

  
Notary Public

My Commission Expires:  
SANDINA M. POPPER  
Notary Public, State of New York  
No. 01PO6056826  
Qualified in Richmond County  
Certificate Filed in Richmond County  
Commission Expires April 2, 2019